

January 14, 2013

VIA ECFS FILING

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Notification of Ex Parte Communication
MB Docket No. 09-182
MB Docket No. 07-294

Dear Ms. Dortch:

This is to advise you, in accordance with Section 1.1206 of the Commission's Rules, that on Friday, January 11, I had a telephone conversation with Alex Hoehn-Saric, Policy Director for Commissioner Rosenworcel, discussing consensus policy positions of the Free Community Paper Industry on matters under consideration by the Commission in the above-shown dockets.

Our most recent Comments filed in the current Quadrennial Review, detailing the continued need for safeguards to preserve fair competition in the local media marketplace, served as the foundation of our conversation. I detailed the long-standing and ever-important role community papers play in their local media ecosystems, noting that decades of macro and micro-level consolidation in print should be further studied along with that in broadcast to provide ample predictive evidence counter to efficiency rationales floated by opponents of newspaper/broadcast cross-ownership safeguards, and suggested that particular attention be paid to the critical distinctions between real places like municipalities and their exponentially larger, artificial and proprietary namesakes rendered by Nielsen as DMAs. I concluded that the worst possible outcome for our industry, the truly local communities they serve and the greater public interest, would be the widespread formation of outsized cross-media entities leveraging traditional advantages, while also given the ability to acquire game-ending digital advantage by way of prioritized content delivery on a closed, proprietary and discriminatory internet, if Ownership Rules proceed as reported and Open Internet Rules fail in the Courts.

As required by Section 1.1206(b), as modified by the policies applicable to electronic filings, an electronic copy of this letter is being submitted in each of the above-referenced dockets.

Respectfully,

Jim Haigh
Government Relations Consultant
Association of Free Community Papers
Mid-Atlantic Community Papers Association

cc (by email):
Alex Hoehn-Saric